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July 13, 2020

BY ECF

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Almonte, et al; 16 Cr. 670 (KMW)

Dear Judge Wood:

As the Court will recall, I, along with Jennifer Louis-Jeune, represented Maria Almonte in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A. Following her convictions after trial, on November 29, 2018, the Court sentenced Ms. Almonte to 240 months’ imprisonment, followed by 5 years’ supervision. Based on Ms. Almonte’s longstanding trauma and mental health history, the Court recommended that Ms. Almonte receive “intensive drug, alcohol and mental health treatment, and that [she] be allowed to participate in the Resolve and FIT programs.” Amended Judgment, Dkt Entry 261. Pursuant to the Court’s additional recommendation, the BOP designated her to FCI Danbury, where she remains

On July 6, 2020, Ms. Almonte filed a *pro se* motion requesting the Court to release her to home confinement in accordance with the First Step Act and pursuant to 18 U.S.C. §3582 (c)(1)(A). After confirmation from Ms. Almonte, I write to respectfully request that Jennifer Louis-Jeune and I be re-appointed to represent Ms. Almonte. Should the Court grant this application, I further request that Ms. Almonte’s *pro se* motion be withdrawn, and that the Court vacate its July 6, 2020 Order, directing the Government to respond by July 20, 2020, so that we can prepare and file a comprehensive “compassionate release” motion in the coming weeks. This motion will be predicated on the current COVID-19 pandemic, and Ms. Almonte’s serious medical conditions that place her, according to the CDC, at high risk for severe illness or death, and her deteriorating mental health.

Granted.
KMW

Thank you for your consideration.

**The Order to respond (ECF No. 307) is vacated.
Defendant may, through newly appointed
counsel, withdraw the pending motion.**

**SO ORDERED.
Dated: July 13, 2020**

/s/ Kimba M. Wood
United States District Judge

Respectfully submitted,

/s/

Anthony Cecutti
Jennifer Louis-Jeune

Attorneys for Maria Soledad Almonte

cc: AUSA Stephanie Lake
AUSA Alison Moe